

The National Grange

Of the Order of Patrons of Husbandry

Building Communities



January 26, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Alltel Corporation Petition for Limited Waiver
WT Docket No. 05-287/DA 05-2675

Dear Ms. Dortch:

The National Grange of the Order of Patrons of Husbandry (National Grange) is the nation's oldest general farm and rural public interest organization. Founded in 1867, today the National Grange represents individual members affiliated with more than 2,800 state, county and local community Grange chapters in 37 states. The National Grange provides community service and leadership based programming to agriculture and rural communities on a wide variety of issues, including economic development, education, family endeavors, and legislation designed to assure a strong and viable Rural America. As such, the National Grange supports the request of Alltel for a waiver seeking an extension of the FCC's December 31, 2005 E911 95 percent handset penetration deadline through June 30, 2007.

In the view of the National Grange, Alltel has been diligent in ensuring its network has the necessary technical capabilities for E911, and the company has been prompt and responsive to public safety needs and concerns in the rural parts of its service territory as deployment and/or service issues have arisen. Alltel has also undertaken significant measures to inform customers in farming and rural communities about the benefits of E911 and to encourage its rural subscribers to obtain location-capable GPS handsets.

As Alltel has explained in their petition, however, some customers have resisted upgrading their analog handsets to GPS models for various personal reasons. It is simply a fact that many rural subscribers are low usage customers and as a result have resisted requests to surrender their

existing handsets. Carriers should be able to permit subscribers to make the choice to keep their old handsets or not upgrade particularly in areas where the PSAP is not Phase II capable as there is no prospect of public harm. This is particularly true for Alltel's waiver showing which notes that within its coverage area, only 25 percent of the PSAP's were Phase II compliant by the end of 2005. Strict enforcement of the December 31, 2005 deadline would unnecessarily inconvenience customers and could undermine rural public safety, particularly in PSAP II non-compliant areas, by preventing any access to 911 if carriers were forced to drop rural subscribers with non-compliant handsets.

The National Grange continues to strongly support the goals of E911. We are additionally grateful for all the hard work the Commission has engaged in on E911. We urge the full implementation of the E911 handset penetration requirements in the most expedient manner practicable without unnecessarily disrupting wireless phone service in large numbers of rural and farming communities. We believe Alltel has so far demonstrated substantial effort and significant measures to encourage subscribers, including rural subscribers, to upgrade their handsets to meet the 95 percent threshold for E911 95 percent handset penetration and will continue to do so over the length of the proposed waiver. The National Grange therefore supports Alltel's request for limited relief through June 30, 2007 as in the best interests of the public.

Sincerely,

Leroy Watson

Leroy Watson, Legislative Director
National Grange of the Order of Patrons of Husbandry